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22 UNITED STATES DISTRICT COURT

23 OF NORTHERN DISTRICT OF CALIFORNIA

24 SAN FRANCISCO DIVISION

25 IN RE: UBER TECHNOLOGIES, INC.,  
26 PASSENGER SEXUAL ASSAULT  
27 LITIGATION

No. 3:23-md-03084-CRB

**DECLARATION OF ELLYN H. HURD IN  
SUPPORT OF PLAINTIFFS' MOTION TO  
PARTIALLY EXCLUDE THE EXPERT  
REBUTTAL TESTIMONY OF LINDSAY  
ORCHOWSKI, PH.D.**

28 This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.,*  
No. 23-cv-06708

**DECLARATION OF ELLYN H. HURD**

I, Ellyn H. Hurd, declare as follows:

1. I am a partner of Simmons Hanly Conroy, LLP, an attorney licensed in the State of Massachusetts, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I have personal knowledge of the following facts, and, if called as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of the rebuttal expert report of Lindsay Orchowski dated October 24, 2025.

3. Attached hereto as **Exhibit B** is a true and correct copy of the deposition of Lindsay Orchowski dated November 11, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of November, 2025, in West Dennis, Massachusetts.

/s/ Ellyn H. Hurd

Ellyn H. Hurd